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March 1, 1996

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Hon. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Interconnection Between Local Exchange and
Commercial Mobile Radio Service Providers
CC Docket No. 95-185.

Dear Secretary Caton:

Enclosed please find an original and nine copies of
Comments of the New York State Department of Public Service in
the above-captioned proceedings.

Respectfully submitted,

Susan M. Narkewicz

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Assistant Counsel

Enclosure
cc: Janice Myles
All Parties
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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Interconnection Between Local)
Exchange and Commercial Mobile) CC Docket No. 95-185
Radio Service Providers)

COMMENTS OF THE NEW YORK STATE
DEPARTMENT OF PUBLIC SERVICE

INTRODUCTION AND SUMMARY

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The New York State Department of Public Service ("NYDPS") submits these comments in response to the Commission's Notice of Proposed Rulemaking ("Notice") inviting comments regarding the establishment of interconnection arrangements between Local Exchange Carriers ("LEC") and Commercial Mobile Radio Service ("CMRS") Providers.

The NYDPS supports the general goals enumerated in the Notice: preserving and advancing universal service, encouraging local exchange competition, and fostering symmetrical regulation of similarly-situated providers. However, we believe such goals are best achieved through a collaborative federal-state approach, rather than by federal preemption. Thus, the NYDPS has concerns with the Federal Communications Commission (the "Commission") proposals that would do more than adopt a federal policy framework to directly govern LEC-CMRS intercarrier interstate interconnection and encourage states to adopt these voluntary guidelines.

The NYDPS is concerned that as a matter of policy, mandating a uniform policy on interconnection rates could be

detrimental to New York's initiatives to promote local exchange competition, create a level playing field among all local service providers, and preserve universal service. Moreover, as a matter of law, the Commission may not preempt states regarding local LEC-CMRS interconnection rates.

Finally, Section 251 of the Telecommunications Act of 1996 imposes interconnection requirements on all local exchange carriers and requires the Commission to adopt rules within six months to implement those requirements. There may be a relationship between this proceeding and the rules adopted pursuant to section 251. Thus, the NYDPS recommends that the Commission incorporate this proceeding into the broader interconnection proceeding mandated under the new Telecommunications Act.

I. Compensation for Interconnected Traffic between LECs and CMRS Providers' Networks

GENERAL COMMENTS

According to the Notice, the genesis of the Commission's current proposal to establish compensation arrangements for LEC-CMRS interconnection is its concern that existing interconnection policies "may not do enough to encourage the development of CMRS, especially in competition with LEC-provided wireline service." (Notice at para. 2) The Commission goes on to state that "it is important that the prices, terms, and conditions of interconnection arrangements not serve to buttress LEC market power against erosion by competition," from CMRS providers. (Notice at para. 2)

The NYDPS agrees that meaningful local competition requires there be alternative sources from which customers may purchase dial tone. In this regard, both cellular and PCS promise to offer competitive alternatives to the LECs for the provision of local exchange service.

Moreover, the NYDPS agrees that a critical aspect to the development of a competitive local exchange marketplace is to ensure a "level playing field" between local exchange carriers ("LECs") and all local service providers -- both wireline and wireless. One way to do so is to ensure reciprocal compensation between carriers for the costs of the traffic and services provided for each other. Additionally, compensation charges and rates should be cost-based, uniform, and non-discriminatory, and encourage long-term efficiency.

Consistent with these principles, the New York Public Service Commission (the "NYPSC") recently adopted a framework for intercarrier compensation (the "September 27 order"). It directed eligible LECs to provide incremental cost based, "meet point" tariffs for the termination of local traffic between facilities based, full service local exchange carriers.^{1/} These tariffs must provide the option of either minute-of-use or flat rate terminations.^{2/}

^{1/} Case 94-C-0095, Order Instituting Framework for Directory Listings, Carrier Interconnection and Intercarrier Compensation, issued September 27, 1995. (Petitions for Rehearing on aspects of this order are pending.)

^{2/} LECs which are facilities based, but choose not to provide services to residential and Lifeline customers, may also file meet point tariffs and charge other carriers (local and long distance) access to their network. However, these LECs must pay a higher access charge to other full service LECs to terminate

This framework provides lower access charges to facilities-based, full service local exchange carriers because those carriers bear the risks of providing essential network facilities and discharge their universal service obligations by providing basic services directly to customers, including residential and Lifeline customers. The NYPSC reasoned that traffic exchanged between such carriers should be priced at incremental cost, eliminating any contribution charges that could otherwise be applied to the exchange of traffic. The framework's essential purpose is to assure that similarly-situated carriers, each having agreed to accept the same public interest obligations and providing comparable services over functionally equivalent networks, are treated in a like manner.

Thus, CMRS providers that can demonstrate they are facilities-based, full service local exchange carriers may participate in intercarrier compensation arrangements at rates equivalent to other similarly situated full service LECs.

The NYDPS is concerned that as a matter of policy, mandating bill & keep for intrastate carrier interconnection could set back New York's efforts to create a level playing field that maximizes the potential development of local exchange competition, while preserving and protecting universal service.

Although bill and keep may offer network neutrality between CMRS and LECs, it is not technologically neutral. The result is to benefit CMRS at the expense of other potential LECs based on the technology employed to originate and terminate

their traffic. (A single party has sought judicial review of this policy.)

calls, since only CMRS providers would be exempt from paying the LECs for terminating traffic. By design, the NYPSC's interconnection framework is indifferent to the technology as well as the network architecture used by individual competitors in the provision of service. In this regard, New York's framework is both technology and network neutral.

Another concern with mandatory bill and keep is that incumbent LECs will not be compensated for performing transport and switching functions that benefit CMRS providers. By singling out wireless technology and related carriers, the Commission's bill and keep proposal could disadvantage wireline companies (both new entrants and incumbents) and could disrupt the balance inherent in New York's interconnection framework.

A. Compensation Arrangements

1. Existing Compensation Arrangements

The Commission requests information regarding current LEC-CMRS reciprocal compensation arrangements for interconnected traffic. The current interconnection arrangements in New York provide reciprocal compensation for all transport and switching functions performed on behalf of the billing company.

The NYNEX Performance Regulation Plan established a system of mutual compensation with cellular carriers that results in a 2.59 cents per minute charge to be billed to the company terminating the call.^{1/} Similarly, parties to the Rochester

^{1/} Case 92-C-0665, Proceeding on the Motion of the Commission to Investigate Performance-Based Incentive Regulation Plans for New York Telephone Company, as previously discussed. CMRS providers which are full service LECs would pay lower, cost-based

Open Market Plan ("Plan") negotiated reciprocal, uniform, minute-of-use charges between competitive wireline and wireless carriers.^{1/} The Plan established a reciprocal compensation arrangement of 2.21 cents per minute for transport and switching functions associated with terminating local traffic.

As previously discussed, the NYPSC's September 27 order directs eligible LECs to provide incremental cost-based, meet point tariffs for termination of local traffic between facilities-based, full service local exchange carriers. LECs must offer both minute-of-use and flat rate options^{2/}. If appropriate interconnections are provided and the network access arrangements are functionally equivalent^{3/}, rates may be equal for traffic exchanged at the meet point. Presently, the peak period interconnection rates between NYNEX and other facilities-based, full service local exchange providers are set at \$0.0074 per minute (end-office interconnection) and \$0.0098 per minute (tandem interconnection). These rates decrease to \$0.0029 (tandem) and \$0.0027 (end office) for termination of off peak

terminating rates.

^{1/} Cases 93-C-0103 and 93-C-0033, Opinion and Order Approving Joint Stipulation and Agreement, Opinion No. 94-25, Appendix, pp. 45-47.

^{2/} The "flat rate" option includes a per month tariffed rate for the dedicated circuit between competitive LEC tandems or end offices, plus a monthly charge for the equipment used to terminate the facility.

^{3/} All LECs must establish mutually agreeable meet points for interconnection. In addition, incumbent LECs must make available a common interconnection meet point at their tandem switching locations. A new entrant without a tandem that provides access that is functionally equivalent to a tandem will be allowed to charge the incumbent's tandem rates at the meet point.

traffic. Flat rate charges range from \$950 per DS1 port (end office interconnection) to \$1,710 per port (tandem interconnection).

3. Pricing Proposals

(a) Interim Approach - Bill and Keep

The Commission proposes bill and keep as its preferred interim approach for LEC-CMRS reciprocal compensation. The Commission contends that bill and keep arrangements are administratively simple to implement, prevent incumbent LECs from charging excessively high interconnection rates, and are economically efficient when traffic is "in balance" or actual interconnection costs are close to zero.

The NYDPS agrees that as an interim approach, bill and keep may be easier to implement than other compensation approaches. However, bill and keep is not the preferred solution as a long term approach to intercarrier compensation in a competitive market.

The principal argument advanced by its proponents in New York (new entrants exclusively) is that bill and keep would balance the competitive equation by compensating for the lack of number portability and other advantages enjoyed by the incumbent LEC. However, even the new entrants cautioned that bill and keep should only be considered as a transitional approach to intercarrier compensation.

One of our concerns with bill and keep is that it may be inconsistent with the principle that the cost causer pays. By all accounts, cellular carriers terminate far more traffic on

wireline LEC networks than they themselves terminate for LECs. For example, in 1995, NYNEX billed cellular carriers approximately \$24 million for local transport. Conversely, it is expected that cellular carriers will bill NYNEX approximately \$3 million in the coming year in local transport charges. Given the current imbalance in terminating traffic between cellular carriers and LECs, mandating bill and keep could lead to LECs not being compensated for a significant portion of their terminating access costs. A LEC then might seek recovery of those lost revenues from other services, such as basic telephone service. Such a result would be contrary to universal service objectives.

(b) Interim Approach - Other Options

The Commission also seeks comments on several alternative interim approaches other than bill and keep. As previously stated, the NYDPS believes that the approach proposed in the Notice for LEC-CMRS intercarrier compensation should be limited to the interstate jurisdiction. Our comments on the various alternative approaches similarly are limited to the merits of each as it applies to interstate interconnection arrangements.

(1) Bill & Keep for Off-Peak Usage

The Commission seeks comments on alternative interim approaches, including bill and keep for off-peak usage. The rationale is that the incremental costs of terminating such traffic is minimal. Currently, NYNEX's off-peak rates, based on

its incremental costs for terminating traffic, is \$0.0027 (end office) and \$0.0029 (tandem) per minute. Moreover, off-peak traffic represents only approximately 7% of NYNEX's total terminating traffic. Presuming similar interstate costs and traffic patterns, limiting bill and keep to off-peak traffic likely would minimize the concerns previously discussed (i.e., not allowing LEC recovery of costs to terminate calls, and favoring CMRS providers over other LEC competitors).

(2) Subset of Access Charges

The Commission asks whether LEC-CMRS interconnection rates should be set based on the LECs' existing interstate access charges (or comparable rates from their intrastate access tariffs). There may be some merit to using interstate access charges in determining the interconnection rate. This approach would allow LECs to be compensated for terminating traffic, while similarly giving providing reciprocal compensation to cellular carriers for terminating wireline calls.

(3) Existing Interconnection Arrangements Between Neighboring LECs

In New York, a combination of meet point and, in limited instances, bill and keep arrangements exist today between incumbent local exchange carriers (generally, for termination of traffic between large LECs and small LECs in adjacent serving areas). In its September 27 order, the NYPSC concluded that

continuing bill and keep between incumbent LECs should be phased-out in order to transition to a competitive framework.^{1/}

Since the Commission envisions CMRS as a competitor to the LEC, it does not appear that interconnection arrangements developed between LECs in a monopoly environment would be appropriate.

(4) Existing Interconnection Arrangements Between LECs and Cellular Carriers

The Commission seeks comments on whether existing interconnection arrangements between LECs and cellular carriers should apply to broadband PCS providers, or to other categories of CMRS providers.

The NYDPS agrees that should PCS develop to the point where it resembles cellular service, then PCS providers should receive comparable interconnection arrangements to cellular and other similarly situated carriers.

(5) Intrastate Interconnection Arrangements Between LECs and New Entrants

The Commission seeks comments on the applicability of intrastate interconnection arrangements between LECs and new entrants as an interim approach.

^{1/} The NYPSC accepted an industry proposal under which termination charges would differ depending on whether competition for local service in the incumbent's territory comes from a new entrant or another incumbent. In the former case, cost-based charges would apply; in the latter, the smaller of the incumbents determines whether to retain the existing billing arrangement. This approach avoids abrupt changes to existing arrangements based solely on competitive encroachment by another carrier and provides smaller companies with additional protection during the transition to a competitive market.

To the extent that interstate interconnection arrangements complement state policies, we believe that competition will be enhanced in both jurisdictions. Thus, we support this proposal.

(6) Measured Local Service Rates

The Commission seeks comments on a fixed percentage of measured local service rates as the standard for LEC-CMRS interconnection rates.

The NYPSC believes that interconnection rates should be cost-based. The use of intrastate local measured service rates as a surrogate for recovering interstate interconnection costs is not consistent with the objective of cost-based rates. Thus, we do not support this proposal.

(7) Uniform Rate

The Commission seeks comment on whether a presumptive uniform per-minute interconnection rate should be established for all LECs and CMRS providers. One option put forth would be to develop such a rate based on one or more (or an average) of state rates.

As previously stated, one of the NYPSC's carrier interconnection principles is that compensation rates be cost-based, uniform, and non-discriminatory. While using state rates in developing an interstate interconnection rate would be consistent with uniformity, we do not support such an approach because in our view, interstate interconnection rates should be based on interstate costs. Therefore, it is not appropriate to

use intrastate interconnection rates, which are based on intrastate costs, as a surrogate for interstate interconnection rates.

(c) Long Term Approach

The Commission also seeks comments on long-term approach to interconnection pricing. Its states two goals: cost-based prices and symmetrical treatment of functionally equivalent forms of interconnection, unless cost differences or other policy considerations justify different rates.

As previously discussed, the NYPSC recently adopted the September 27th order instituting a framework for intercarrier compensation. We believe that New York's actions are consistent with the Commission's goals. Thus, we urge the Commission to be mindful that forward looking interconnection policies like those adopted in New York should not be jeopardized.

B. Implementation of Compensation Arrangements

1. Negotiations and Tariffing

The Commission proposes that information about interconnection arrangements should be made publicly available in order to foster competition and to advance the public interest. The Commission should consider New York's intercarrier compensation framework, under which carriers are free to negotiate mutually acceptable and non-discriminatory terms that vary from the baseline (September 27 order); however, such options must be tariffed. We believe this approach strikes the appropriate balance, encouraging good faith negotiations among

carriers, while ensuring that the terms and conditions of individual interconnection arrangements are not discriminatory.

II. Jurisdictional Issues

The FCC invites comments on the following three alternative approaches regarding jurisdiction of LEC-CMRS interconnection policy: 1) adopt a federal policy framework to directly govern LEC-CMRS intercarrier interstate interconnection and encourage states to adopt these voluntary guidelines; 2) adopt a mandatory federal policy framework to govern both interstate and intrastate interconnection, but include broad parameters within which state commissions would have substantial latitude in developing specific requirements; or 3) adopt specific, mandatory federal regulations for interstate and intrastate LEC-CMRS interconnection arrangements. The NYDPS does not believe that the Commission has the authority to mandate intrastate rates for interconnection between LEC-CMRS providers.

Section 332(c)(3) of the Budget Reconciliation Act (the "Act")^{1/} provides that notwithstanding sections 2(b) and 221(b) of the Communications Act, states may not regulate the entry of or the rates charged by any commercial mobile service.^{2/} However, the express provisions of the Act also address the Commission's role with respect to interconnection. Specifically,

^{1/} Budget Reconciliation Act, P.L. 103-66.

^{2/} Implementation of Sections 3(n) and 332 of the Communications Act: Regulatory Treatment of Mobile Services, Second Report and Order, GN Docket No. 92-525, 9 FCC Rcd 1411, para. 237 (1994) ("Second Report and Order"). Notwithstanding, the Act makes clear that this does not prevent the states from regulating the other terms and conditions of commercial mobile services, and from petitioning the Commission for authority to regulate the rates for any commercial mobile service.

in §332(c)(1)(B), Congress authorized the Commission to order a common carrier to interconnect with CMRS providers pursuant to the Commission's authority in Communications Act Section 201.^{1/} Section 332(c)(1)(B) further provides that this "shall not be construed as a limitation or expansion of the Commission's authority to order interconnection pursuant to... [the Act]." Since CMRS providers are treated as common carriers under section 332(c)(1)(A), the Commission's authority with respect to interconnection of CMRS providers is no greater than it would be under Section 201. Therefore, pursuant to 47 USC 152(b), the Commission may not preempt the state from regulating intrastate rates with respect to interconnection.

Prior to the Act, the Commission acknowledged the limitation on its Communications Act Section 201 authority. In deciding whether its jurisdiction extended to all charges applicable to the rates that landline carriers charge for cellular interconnection, the Commission emphasized that its authority was limited to the actual interstate cost of interconnection, plus ensuring that interconnection is provided for interstate services.^{2/} Now the arguments against federal preemption are even stronger since Congress explicitly prohibited

^{1/} Section 201 states, in part, "It shall be the duty of every common carrier engaged in interstate or foreign communication...to furnish such communication service upon reasonable request therefor; and, in accordance with the orders of the Commission...to establish physical connections with other carriers..."

^{2/} In the Matter of the Need to Promote Competition and Efficient Use of Spectrum for Radio Common Carrier Services, Report No. CL-379, 2 FCC Rcd. 2910 (1987) at para. 18.

the Commission from expanding its Section 201 authority over interconnection.

The Commission previously acknowledged the states' jurisdiction over local rates when it observed that "revised Section 332 does not extend the Commission's jurisdiction to the regulation of local CMRS rates".^{1/} More recently, the Commission correctly recognized that it lacks the jurisdiction to regulate the rates charged by LECs to CMRS providers when it specifically noted that state "regulation of the interconnection rates [charged] by landline telephone companies to CMRS providers appears to involve rate regulation only of the landline companies, not the CMRS providers, and thus does not appear to be circumscribed in any way by Section 332(c)(3)".^{2/}

Conclusion

In conclusion, the NYDPS is concerned that as a matter of policy, mandating bill & keep for intrastate carrier interconnection could set back New York's efforts to create a level playing field that maximizes the potential development of local exchange competition, while preserving and protecting universal service. Although bill and keep may offer network neutrality between CMRS and LECs, it is not technologically neutral. By singling out wireless technology and related

^{1/} Second Report and Order, GN Docket No. 92-525, 9 FCC Rcd 1411, 1480 (1994).

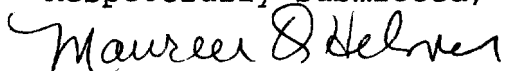
^{2/} Petition on Behalf of the Louisiana Public Service Commission for Authority to Retain Jurisdiction Over Commercial Mobile Radio Services Offered Within the State of Louisiana, Report and Order in PR Docket 94-107, 10 FCC Rcd 7898, 7908 (1995).

carriers, the Commission's bill and keep proposal could disadvantage wireline companies (both new entrants and incumbents) and disrupt the balance inherent in New York's interconnection framework.

The NYDPS agrees that as an interim approach, bill and keep may be easier to implement than other compensation approaches. However, bill and keep is not the preferred solution as a long-term approach to intercarrier compensation in a competitive market, in part, because it may be contrary to universal service objectives. Other interim approaches are acceptable only to the extent they apply to interstate interconnection arrangements. In regards to both interim and long-term approaches to interconnection pricing, the NYDPS urges the Commission to be mindful that forward-looking interconnection policies like those adopted in New York should not be jeopardized.

Finally, as a matter of law, the Commission may not preempt states regarding local LEC-CMRS interconnection rates.

Respectfully submitted,



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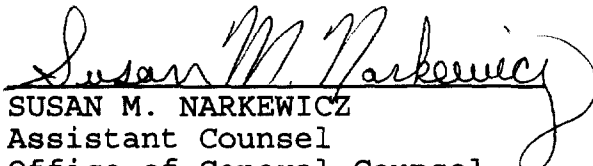
Dated: March 1, 1996
Albany, New York

CC Docket 95-185

In the Matter of Interconnection
Between Local Exchange and
Commercial Mobile Radio Service Providers

CERTIFICATE OF SERVICE

I hereby certify that an original plus nine copies of the above-captioned proceeding were sent via Federal Express to Mr. Caton, and by first class United States mail, postage prepaid, to all parties on the attached service list.


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